

EXHIBIT 43

IN THE UNITED STATES COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION MDL No. 2804  
Case No.  
17-mdl-2804  
Judge Dan Polster

This document relates to:  
The County of Cuyahoga, Ohio, et al., v.  
Purdue Pharma L.P., et al.,  
Case No. 1:17-OP-45004 (N.D. Ohio)

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Videotaped deposition of
DEREK SIEGLE
January 23, 2019
9:20 a.m.

Taken at:
Baker Hostetler, LLP
127 Public Square, Suite 2000
Cleveland, Ohio
Wendy L. Klauss, RPR

1 Q. Are you aware that it is a horse
2 tranquilizer?

3 A. I am aware that it is a large
4 animal tranquilizer, yes.

5 Q. And where is the carfentanil that
6 you are seeing in Ohio HIDTA coming from?

7 A. According to the information that
8 we receive from the investigative initiatives,
9 it is coming either directly from China, you
10 know, via some type of partial shipment, or is
11 being shipped to Mexico and then brought up.

12 Q. Have you ever heard of an
13 instance -- has anyone ever reported that a
14 pharmaceutical company, like the defendants in
15 this case, has ever shipped carfentanil into
16 the Ohio HIDTA region?

17 A. I have never been told that.

18 Q. Fentanyl has -- there is a
19 prescription form of fentanyl and then there
20 are fentanyl analogs that can't be prescribed
21 in the Ohio HIDTA region, correct?

22 A. I don't know that. I don't know
23 the pharmaceutical guidelines.

24 Q. The fentanyl that you are seeing in
25 Ohio HIDTA that's causing problems, is it

1 they couldn't get one, they would do the other.

2 Q. Other than cocaine and heroin, what
3 other -- and methamphetamine, are there any
4 other drugs that are being abused in Ohio HIDTA
5 today?

6 A. We still see the seizure of illicit
7 prescription drugs, as we call them, or
8 pharmaceutical drugs are still seizing, still
9 seizing those pills, and people are still using
10 those. Marijuana is the most widely used
11 recreational drug.

12 Q. Is marijuana abuse a problem in
13 Ohio HIDTA?

14 A. I don't know if I'm qualified to
15 say what abuse is.

16 Q. What would you say the most
17 significant drug problem in Ohio HIDTA today
18 is?

19 A. Still heroin, fentanyl.

20 Q. How long has heroin and fentanyl
21 been the most significant drug problem in Ohio
22 HIDTA?

23 A. As I mentioned, without reports in
24 front of me, probably approximately 2012
25 timeframe when heroin -- we started to see more

1 heroin, and fentanyl has probably emerged in
2 the last two years or so.

3 Q. Prior to heroin and fentanyl, what
4 was the greatest drug threat in the Ohio HIDTA
5 region?

6 A. I would have to look at the
7 reports, but I believe cocaine would have been
8 at least what we were seizing, and again,
9 that's based on what we seize. I don't know if
10 that gives an indication of what's being used.

11 Q. Can you recall any point in time in
12 which the greatest drug threat identified in
13 Ohio HIDTA region was prescription opioids
14 specifically?

15 A. I cannot specifically recall,
16 without looking back at reports, and probably
17 those would have been maybe even before my
18 tenure.

19 Q. Would it surprise you if none -- if
20 I were to represent to you that none of the
21 annual reports have identified prescription
22 opioids as the greatest drug threat in the
23 region?

24 A. That might not surprise me if it
25 wasn't the greatest, but I would be surprised

1 Q. And you don't have any reason to
2 doubt the accuracy of that reported, at least
3 for that year?

4 A. No, I don't.

5 MR. RAIOLA: Do we want to take a
6 break? I'm about to switch subjects. We have
7 been going about an hour. Does that work?

8 THE WITNESS: That's fine.

9 MR. O'BRIEN: That's fine.

10 THE VIDEOGRAPHER: 11:49, going off
11 the record.

12 (Recess taken.)

13 THE VIDEOGRAPHER: It is 12:10. We
14 are back on the record.

15 Q. Welcome back, Mr. Siegel.

16 A. Okay. Thank you.

17 Q. We were talking a little bit about
18 heroin, fentanyl and carfentanil this morning.

19 Where is the heroin that is causing
20 problems in Ohio HIDTA coming from?

21 A. The Southwest border.

22 Q. Anywhere else?

23 A. Primarily there. Every now and
24 then we might see some come down from New York.

25 Q. And that's coming from drug

1 trafficking organizations?

2 A. Or possibly Chicago via the
3 Southwest border, then over.

4 Q. And is the source of those drugs
5 drug trafficking organizations?

6 A. Yes.

7 Q. Any ones in particular?

8 A. Again, my knowledge comes from what
9 I glean from the task force commanders, because
10 I'm not out there operational. It's the
11 Sinaloa Cartel.

12 Q. The defendants in this case, the
13 pharmaceutical manufacturers and distributors
14 and retail pharmacies, don't sell heroin,
15 right?

16 A. I don't believe so.

17 Q. So as far as you are aware, the
18 source of all the heroin in Ohio HIDTA is
19 coming from these drug trafficking
20 organizations, like the Sinaloa Cartel; is that
21 fair?

22 A. Correct.

23 Q. Where does the majority of the
24 fentanyl that's causing problems in Ohio HIDTA
25 come from?

1 A. Different routes, but originating
2 in China, primarily.

3 Q. How does it get here from China?

4 A. Via parcel post or to Mexico and
5 then brought up via carrier.

6 Q. What are the other methods besides,
7 kind of, the mail orders from China that are
8 sources of illicit fentanyl?

9 A. The other sources or the other
10 means?

11 Q. Are there other sources than China?

12 A. I don't know. I believe there is
13 some other countries that might be also
14 producing that, but it's primarily China and
15 then through Mexico.

16 Q. Again, are those drug trafficking
17 organizations?

18 A. Yes.

19 Q. I believe I asked you this question
20 earlier, but in case I didn't, I just want to
21 double-check.

22 There is a prescription fentanyl,
23 but is the majority of fentanyl-related
24 problems you are seeing in Ohio HIDTA relating
25 to illicit fentanyl that is coming from drug